

August 12, 2004

Michael K. Powell  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**MB Docket No. 04-207**

Dear Chairman Powell:

My name is Reverend Dr. Walter B. Johnson, Jr. and I am the past President of the African Methodist Episcopal Ministerial Alliance of Chicago and Vicinity. Our organization is a network of churches throughout the Chicagoland area that promotes faith and encourages moral values and social activism for the betterment of the communities that we live in.

I believe firmly that in today's cable system there is a need for more wholesome, family-oriented programming that targets the inner city, rural and other underserved populations. My disagreement with those who support the a la carte model of cable subscription is about the path we take to get there, and the costs to the progress we have already made.

In his comments to the FCC, Reverend Glenn Plummer asks the Commission to consider the a la carte model as a viable alternative to the current cable system. I respectfully suggest, however, that the adoption of the a la carte model would lead us down the wrong path. Instead of creating more diversity—a goal we all share—an la carte model would actually make it harder for the smaller, more minority-oriented cable channels to survive, or even come into existence at all.

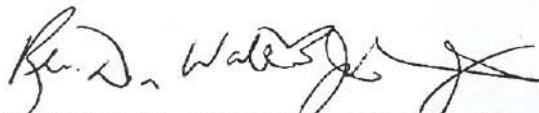
Alfred Liggins, the chairman of TV One, a new network aimed at African Americans, put it most succinctly recently in an op-ed piece in the Washington Times, writing that adoption of a la carte "would have a chilling effect on programming diversity in America," and that it "could put us and many other innovative cable networks out of business." His conclusions have been borne out by reports from the General Accounting Office last fall and by Booz Allen Hamilton just this month, which found that a la carte programming would likely result in fewer niche programs on cable television.

Reverend Plummer's comments rightly acknowledge the possibility that the a la carte model could have significant negative effects on diversity and consumer choice: "In short, while a la carte would ostensibly offer consumers more freedom to choose, in the end their choices could be reduced if the economic model that supports many broadcasters is damaged or destroyed."

That damage and destruction is precisely what would unfold under an a la carte model. If the smaller, more independent and minority-focused networks were unable to receive the advertising revenue that comes from being bundled with other, larger networks, most of these smaller networks would fail. Without shared advertising revenue, the constraints on starting a new network from scratch would become even more prohibitive than they already are.

In the end, the a la carte model is simply not the right answer to address our desire for more programming for African American communities. We have made a lot of progress in terms of diversity on television over the years, and I do not think we can afford now to entertain the idea of adopting a system that would peel back any of these hard-won gains.

Sincerely,

A handwritten signature in black ink, appearing to read "Rev. Dr. Walter B. Johnson, Jr.", with a stylized flourish at the end.

Reverend Dr. Walter B. Johnson, Jr.  
Past President,  
AME Ministerial Alliance of Chicago and Vicinity  
Pastor, Wayman AME Church